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7 *dba Luxor Hotel & Casino, New Castle Corp.*  
8 *dba Excalibur Hotel & Casino, Circus Circus Casino Inc.*  
*dba Circus Circus Hotel & Casino*

9  
10 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

11 TRUSTEES OF THE NEVADA RESORT  
ASSOCIATION—INTERNATIONAL  
12 ALLIANCE OF THEATRICAL STAGE  
EMPLOYEES AND MOVING PICTURE  
13 MACHINE OPERATORS OF THE UNITED  
STATES AND CANADA, LOCAL 720,  
14 PENSION TRUST; TRUSTEES OF THE  
NEVADA RESORT 'ASSOCIATION  
15 INTERNATIONAL ALLIANCE OF  
THEATRICAL STAGE EMPLOYEES AND  
16 MOVING PICTURE MACHINE OPERATORS  
OF THE UNITED STATES AND CANADA,  
17 LOCAL 720, WAGE DISABILITY TRUST;  
and TRUSTEES OF THE NEVADA RESORT  
18 ASSOCIATION—INTERNATIONAL  
ALLIANCE OF THEATRICAL STAGE  
19 EMPLOYEES AND MOVING PICTURE  
MACHINE OPERATORS OF THE UNITED  
20 STATES AND CANADA, LOCAL 720,  
APPRENTICE AND JOURNEYMAN  
21 TRAINING AND EDUCATION TRUST,

22 Plaintiff,

23 vs.

24 RAMPARTS, LLC dba Luxor Hotel & Casino, a  
Nevada limited liability company; NEW  
25 CASTLE CORP. dba Excalibur Hotel & Casino,  
a Nevada corporation; and CIRCUS CIRCUS  
26 CASINOS INC. d/b/a CIRCUS CIRCUS  
HOTEL & CASINO, a Nevada corporation,

27 Defendants.  
28

**Case No.: 2:19-cv-01536-RFB-BNW**

**STIPULATION AND ORDER TO  
STAY ACTION UNTIL JUNE 11, 2020**

(First Request)

1 IT IS HEREBY STIPULATED by and between Plaintiffs, TRUSTEES OF THE  
 2 NEVADA RESORT ASSOCIATION—INTERNATIONAL ALLIANCE OF THEATRICAL  
 3 STAGE EMPLOYEES AND MOVING PICTURE MACHINE OPERATORS OF THE UNITED  
 4 STATES AND CANADA, LOCAL 720, PENSION TRUST; TRUSTEES OF THE NEVADA  
 5 RESORT ASSOCIATION—INTERNATIONAL ALLIANCE OF THEATRICAL STAGE  
 6 EMPLOYEES AND MOVING PICTURE MACHINE OPERATORS OF THE UNITED  
 7 STATES AND CANADA, LOCAL 720, WAGE DISABILITY TRUST; and TRUSTEES OF  
 8 THE NEVADA RESORT ASSOCIATION—INTERNATIONAL ALLIANCE OF  
 9 THEATRICAL STAGE EMPLOYEES AND MOVING PICTURE MACHINE OPERATORS  
 10 OF THE UNITED STATES AND CANADA, LOCAL 720, APPRENTICE AND  
 11 JOURNEYMAN TRAINING AND EDUCATION TRUST (“Plaintiffs”), through their counsel  
 12 The Urban Law Firm, and Defendants Ramparts, LLC dba Luxor Hotel & Casino, New Castle  
 13 Corp. dba Excalibur Hotel & Casino,<sup>1</sup> Circus Circus Casinos Inc. dba Circus Circus Hotel &  
 14 Resort,<sup>2</sup> (“Defendants”) through their counsel Jackson Lewis P.C., that this action be stayed in its  
 15 entirety for 45 days, until June 11, 2020, with this Court’s approval. This Stipulation is submitted  
 16 and based upon the following:

17 1. Due to the public health and safety issues caused by COVID-19, the Parties  
 18 anticipate significant delays in the discovery process. Defendants have temporarily ceased all  
 19 business operations for health and safety reasons, and will continue to do so in accordance with  
 20 the directive of Governor Steve Sisolak. During this time, the Defendants will be unable to  
 21 participate meaningfully in discovery.

22 2. Due to these circumstances, the Parties agree it is appropriate that this matter be  
 23 stayed in its entirety for a period of 45 days, until June 11, 2020.

24 3. Should circumstances change such that a shorter or a longer stay is appropriate, the  
 25 parties will immediately and jointly notify the Court.

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 27 <sup>1</sup> Defendant New Castle, LLC, is incorrectly named “New Castle Corp.” in the Complaint.

28 <sup>2</sup> The Complaint incorrectly identifies Circus Circus Casinos, Inc. dba Circus Circus Hotel & Resort as  
 “dba Circus Circus Hotel & Casino.”

4. On June 11, 2020, the Parties will submit a status report to the Court with proposed revised discovery and scheduling deadlines in the case. Should an additional stay be necessary because of circumstances relating to COVID-19, the Parties will submit a status report explaining the circumstances and any additional time need for stay of this action.

5. This request is made in good faith and not for the purpose of delay.

Dated this 27th day of April, 2020.

**THE URBAN LAW FIRM**

**JACKSON LEWIS, P.C.**

/s/ Nathan R. Ring

/s/ Lynne K. McChrystal

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*Counsel for Plaintiff Trust Funds*

*Counsel for Defendants*

**ORDER**

IT IS SO ORDERED:



RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

DATED this 29th day of April, 2020.